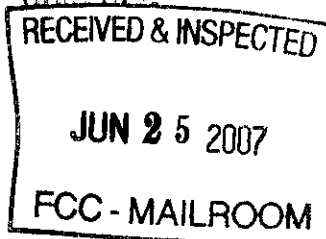


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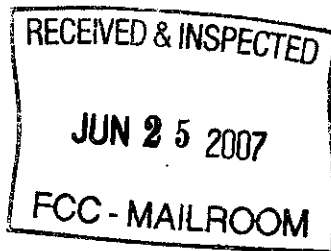


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*All children can and will learn.*

**FAX COVER**



25, 2007

yn Dortch Via: Fax (202) 418-0187  
Communications Commission  
the Secretary  
Street, SW  
on, DC 20554

as to Request for Appeal/Waiver  
t: Galveston Independent School District  
1339  
Year: 2006  
Application Number: 495787  
Request Numbers: 1394796, 1394809, 1394818, 1394857, 1394894, 1394909,  
1452998

et No. 2-06 and CC Docket No. 96-45

ynne Cleveland, Superintendent  
Galveston ISD  
904 Avenue T.  
Galveston, Texas 77550  
(409) 766-5121  
(409) 766-5106 (Fax)

umber of Pages Faxed: 77

ET: Cover plus pages 1-16  
SET: Cover plus pages 17-52  
SET: Cover plus pages 33-51  
H SET: Cover plus pages 52-77

Lynne Cleveland, Superintendent

Box 690 • Galveston, Texas 77553 • (409) 766-5100 (Office) • (409) 766-5106 (Fax)



*All children can and will learn.*

RECEIVED & INSPECTED

JUN 25 2007

FCC - MAILROOM

2007

for Appeal/Waiver  
Dorich  
Communications Commission  
of the Secretary  
Street, SW  
ton, DC 20554

ins to  
nt: Galveston Independent School District  
41339

Year: 2006

1 Application Number: 495787

Request Numbers: 1394796, 1394809, 1394818, 1394857, 1394894, 1394909,  
1452998

cket No. 2-06 and CC Docket No. 96-45

Dorich,

Independent School District (hereafter called GISD) respectfully requests an appeal/waiver to  
FCC Rules requiring a signed agreement or Letter of Agency (LOA) for consultants utilized by an  
entity, as determined by the USAC.

USAC issued a letter from USAC dated April 26, 2007, denying GISD's appeal of USAC's funding  
decision letter dated August 15, 2006. In this letter, USAC denied GISD's request for E-Rate  
funding of \$417,281.47 for the year 2006 based upon the determination that GISD violated competitive  
requirements of its FCC. USAC perceived there to be a failure on the part of GISD to have a signed  
agreement in place for the 2006 E-Rate year. (See Exhibit "A" attached) The USAC states in its  
letter that "The Origin Group" acted as a consultant without signing an agreement. Its decision further  
states "FCC Rules require that FCC Forms 470 and 471 be signed by a person authorized to order  
communications and other supported services for eligible entities and to certify under oath to all the  
certifications." Consequently, the funding requests were denied for violation of the competitive  
requirements."

USAC has misinterpreted FCC Rules by requiring that any consultant that provides  
services to an eligible entity is required to have a signed LOA, when that consultant does not sign, authorize,  
or certify FCC Forms 470 and 471 and does not assist the applicant in any manner with the competitive  
requirements process.

Lynne Cleveland, Superintendent

P.O. Box 400 - Galveston, Texas 77553 - (409) 766-5100 (Office) - 409-766-5106 (Fax)

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JUN 25 2007

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regarding "Consultant Letter of Agency" as documented on the USAC web site are as follows:

"A consultant or anyone signing as the authorized person, who is not a school or library employee, should also have an LOA from the applicant expressly authorizing the consultant to represent the applicant." (See Exhibit B-1 attached hereto)

Also, the "Sample Letter of Agency (LOA)" news release provided to applicants by the USAC on the Exhibit B-2 attached hereto states:

"A Letter of Agency demonstrates the authorization of the person (an FCC form, the Authorized Person) to sign an FCC form on behalf of one or more eligible schools and/or libraries. Generally, two situations require an LOA or similar authorizing document:

... (2) A consultant—or anyone signing as the authorized person who is not a school or library employee—should have an LOA from the applicant expressly authorizing the consultant to represent the applicant."

and agree that a consultant agreement or LOA is required when the consultant is not the authorized order telecommunications and other supported services for the eligible entity and to certify under the required certifications. Additionally, the consultant utilized in an advisory capacity by GISD (a Group) was not authorized to sign, authorize, or certify FCC forms 470 and 471 on behalf of in fact, did not sign, authorize, or certify FCC forms 470 and 471 on behalf of GISD during the B-cycle.

GISD's application 470 number 19194000561722 and Form 471 application number 495767 for funding year 2006, was prepared, reviewed and signed by *Nurzio Arcidiacoro*, a GISD employee, who served as Director of Purchasing for the District. (See Exhibit C attached hereto indicating Mr. Arcidiacoro's employment status, Exhibit D attached hereto of the certification pages for Forms 470 and 471 for funding year 2006, signed and certified by Mr. Arcidiacoro.)

Chris Webber, a GISD employee, who served as Director of MIS, was named as the contact person for the aforementioned 470 and 471. (See Exhibit "E" attached indicating Mr. Webber's employment status with GISD and attesting to the fact that Christopher C. Webber, GISD's employee, is not Christopher B. Webber, a consultant out of the state of Oklahoma).

Both Mr. Arcidiacoro and Mr. Webber, as GISD employees, acting in their respective positions with the district, were authorized to order telecommunications and other supported services for GISD and were authorized to certify under oath to all the FCC required certifications.

Correspondence sent to USAC on 5/23, in response to USAC's question as followup to SR-2006-14339, regarding GISD's use of a consultant. (See Exhibit F hereto attached), GISD states that the Origin Group provided the following services for B-Rate funding year 2006:

- provided recommendations to GISD for eligible services.
- assisted GISD in preparing information necessary to complete Forms 470.
- assisted GISD in preparing information and required documentation for completion Forms 471

The Origin group never took any official action related to B-Rate on behalf of GISD.

Also, FCC rules, as detailed on the USAC website regarding the Competitive Bidding Process, state:

"The competitive bidding process must be fair and open. "Fair" means that all bidders are treated the same and that no bidder has advance knowledge of the project information. "Open" means there are no secrets in the process... The Form 470 should be clear about the products, services, and quantities the applicant is seeking..."

The rule goes on to further say "... a conflict of interest exists when the applicant's consultant is associated with a service provider that is selected and is involved in determining the services sought by the applicant and the selection of the applicant's service providers." (See Exhibit G attached hereto)

Thus, GISD asserts the following:

1. GISD followed all FCC and State competitive bidding requirements in the filing of its requests for E-rate services for 2006. At no time did the Origin Group assist GISD in the competitive bidding process (See Exhibit E, portion related to competitive bidding of SR-2006-141339). GISD responds submitted May 19, 2006 attached hereto)
2. Origin Group was never authorized to request GISD in any of the competitive bidding transactions or in any other matter relating to E-Rate applications.
3. Origin Group does not represent a service provider and is not a service provider and, therefore, does not create a conflict of interest in determining the services sought by the applicant and the selection of the applicant service providers. (See Exhibit 1, letter from the Origin Group dated June 21, 2007, attached hereto)

#### SUMMARY: GISD'S REQUEST FOR APPEAL/WAIVER

- (1) It is the position of GISD that FCC rules are ambiguous as to the requirement to have a Letter of Agency in an instance where the consultant plays only a ministerial role in the E-Rate application process.
- (2) USAC's actions were confusing in not asking specific questions with respect to the exact role the Origin Group played in GISD's 2006 E-Rate application. During the SR-2006-141339 and follow-up phases, USAC did not ask if Origin Group was the signer of our application or was a service provider.
- (3) GISD acknowledges that we did not have a signed agreement with the Origin Group for 2006 E-Rate year. GISD further asserts that a signed agreement is not necessary. GISD also asserts that the Origin Group only acted as an advisor, and did not represent us in any official capacity.
- (4) Additionally, the Origin Group is not a service provider and does not provide E-Rate eligible services. Thus, GISD asserts that competitive bidding requirements were not violated and there was no attempt to defraud the government.
- (5) USAC's documentation never specifically refers to an LOA being required when a consultant simply serves in an advisory capacity to an applicant. GISD further points out that State E-Rate Coordinators function also in an advisory capacity to applicants.

In the event GISD has been mistaken in its interpretation of the requirement for an LOA in all instances, then GISD respectfully requests the FCC to waive this LOA requirement, as it pertains to GISD's application for 2006 E-Rate funding.

Contact Name: Arnold Proctor, Assistant Superintendent for Business and Operations  
 Address: P. O. Box 660, Galveston, Texas 77553  
 Telephone: 409-766-5127  
 Fax: 409-766-5106  
 Email: Arnold\_Proctor@gisd.org

Sincerely,

*Arnold Proctor*  
 Arnold Proctor  
 Superintendent

**Exhibit A**

BEN: 141339  
Form 471 Application Number: 495787

07-05-02A08:26 RC



Universal Service Administrative Company  
Schools & Libraries Division

**Administrator's Decision on Appeal - Funding Year 2006-2007**

26, 2007

Webber  
Galveston Independent School District  
Avenue T  
Galveston, TX 77550

Applicant Name: GALVESTON INDEP SCHOOL DIST  
Billed Entity Number: 141339  
Form 471 Application Number: 495787  
Funding Request Number(s): 1394796, 1394809, 1394818, 1394857, 1394894,  
1394909, 1394918, 1452998  
Your Correspondence Received: April 12, 2007

After thorough review and investigation of all relevant facts, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has made its decision in regard to your appeal of USAC's Funding Year 2006 Funding Commitment Decision Letter for the Application Number indicated above. This letter explains the basis of USAC's decision. The date of this letter begins the 60 day time period for filing this decision to the Federal Communications Commission (FCC). If your Appeal included more than one Application Number, please note that you will receive a separate letter for each application.

Funding Request Number(s): 1394796, 1394809, 1394818, 1394857, 1394894,  
1394909, 1394918, 1452998  
Decision on Appeal: Denied  
Action:

After thorough review of the appeal and the relevant facts and documentation, it was determined that a consultant was used for the preparation of the Forms 470 and completion of the Forms 471, but Galveston Independent School District failed to provide a consultant agreement or Letter of Agency. On May 19, 2006, the District submitted documentation which stated the District did not have a signed consultant agreement or Letter of Agency. The Reviewer sent additional follow up questions on May 23, 2006, asking the District to submit a signed copy of the consulting agreement and list the services rendered by the consultant. In response to the request for further clarification, the District stated that the consultant assisted with the completion of the Forms 470 and Forms 471.

According to documentation submitted to USAC, The Origin Group acted as a consultant without signing an agreement with the District. Consequently, the funding requests were denied for violation of the competitive bidding requirements. On appeal you submitted a copy of a consulting agreement between Galveston School District and The Origin Group. Program rules do not permit USAC to accept new information on appeal except where an applicant was not given an opportunity to provide information during the initial review or an error was made by USAC. Therefore, the appeal is denied.

FCC Rules require that FCC Forms 470 and 471 be signed by a person authorized to order telecommunications and other supported services for the eligible entities and certify under oath to all the required certifications. 47 C.F.R. secs. 54.504(b)(2), 54.504(e)(1). The authorized person certifies on the Form 470 and Form 471 that he or she is the person authorized to submit and certify to the accuracy of the applications. See Schools and Libraries Universal Service, Description of Services Requested and Certification Form 470, OMB 3060-0806, Block 5 and Schools and Libraries Universal Service, Services Ordered and Certification Form 471, OMB 3060-0806, Block 6. Consultants or other signers who are not employees of the Billed Entity must have a Letter of Agency from the applicant affirming that they are authorized to represent the applicant. See Instructions for Completing the Schools and Libraries Universal Service Services Ordered and Certification Form (FCC Form 471), OMB 3060-0806 and the Reference Area at our website, [www.usac.org/sl](http://www.usac.org/sl). Additionally, the FCC has stated that, if consultants are involved, beneficiaries must retain signed copies of all written agreements with E-rate consultants. See Schools and Libraries Universal Service Support Mechanism, CC Docket No. 02-6, Fifth Report and Order and Order, 19 FCC Red 15808, 15824-26, FCC 04-196 para. 43 (rel. Aug. 13, 2004).

If your appeal has been approved, but funding has been reduced or denied, you may appeal these decisions to either USAC or the FCC. For appeals that have been denied in whole or partially approved, dismissed, or canceled, you may file an appeal with the FCC. Your appeal should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. Your appeal must be received or postmarked within 60 days of the date on this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554. Further information and options regarding an appeal directly with the FCC can be found in the "Appeals Procedure" section in the Reference Area of the SED section of the USAC website or by contacting the National Service Bureau. We strongly recommend that you use the electronic filing system.

Thank you for your continued support, patience and cooperation during the appeal process.

Schools and Libraries Division  
Universal Service Administrative Company

01-05-02A08:26 RCVD



07-05-02AD8:40 RCVB

Chris Webber  
Galveston Independent School District  
3904 Avenue I  
Galveston, TX 77550

Billed Entity Number: 141339  
Form 471 Application Number: 495787  
Form 484 Application Number:

**Exhibit B-1**

BEN: 141339  
Form 471 Application Number: 495787

Service Administrative Company

on the Form 471 - the person whose signature appears in the Form 471 Item 33 - certifies that he or she is the submitter and certifies to the accuracy of the application. This person must be authorized to represent any and all of the consortium members in the funding requests featured on the application. During its review of the Form 471, USAC will review the documentation that confirms the person's authorization to represent all of the entities featured on the application. The documentation that establishes this authorization - and therefore, that establishes the relationship between the authorized person and the consortium - is generally a Letter of Agency (LOA).

#### Letter of Agency

A LOA is most commonly signed by consortium members and kept on file by their consortium leader to verify their membership and participation in the consortium. Other vehicles to establish this authorization could be a project charter, a letter agreement, or other similar document. The consortium LOA must be signed and dated on or before the date of the Form 471 certification or the date the form was certified online.

#### Authorized Person

A person signing as the authorized person who is not a school or library employee should also have an LOA from the entity authorizing the consultant to represent the applicant. The consultant LOA must be signed and dated before the date of the Form 471 certification or the date the form was certified online.

The document establishing the above authorization, it must contain all of the following:

- The person filing the application (the consortium leader or consultant)
- The person authorizing the filing of the application (the entity who will receive discounted services, such as a school or library)

The LOA or authorizing document covers (for example, the 5-State Funding Year 2008) the signature, date, and title of an official who is an employee of the entity who is authorizing the filing of the application (the entity who will receive discounted services, such as a consortium member).

The LOA or authorizing document must be signed and dated on or before the date of the Form 471 certification or the date the form was certified online. The description of services can be as general as "all services" or it can be more restrictive (e.g., "basic telephone service only").

None of these authorizations cannot be open-ended, such as "until terminated by either party."

Other documentation may be accepted as proof of authorization. For example, for consortium applications, the consortium leader must either collect LOAs from each consortium member or be able to provide some other proof that each member was represented on the application. Consortia which have a statutory or regulatory basis and for which membership or participation is mandatory must be able to provide documentation supporting this certification, including copies of the statute or regulation.

If a consortium leader is applying for discounted services on your behalf, then it must be signed and dated on or before the date of the Form 471 certification or the date the form was certified online. If the LOA authorizes a consultant to represent the applicant, then it must be signed and dated before the first action is taken by that consultant on your behalf (such as filing the Form 471).

Example Letter of Agency (PDF, 37 KB) that can be used as a reference guide.

Last modified on 5/25/2007

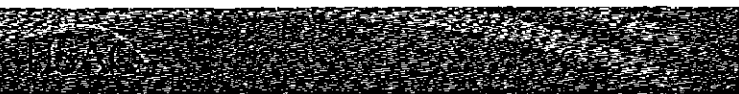
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[usac.service.org/sl/tools/reference/letters-of-agency.aspx](http://usac.service.org/sl/tools/reference/letters-of-agency.aspx)

6/25/2007

**Exhibit B-2**

BEN: 141339  
Form 471 Application Number: 495787



Universal Service Administrative Company

Schools and Libraries

Home > [About Us](#) > [Contact Us](#) > [Funding](#) > [February 2005 Announcements](#)

## February 2005 Announcements

Please click on the topic below to view the most recent announcements:

- [Holiday Hours Announcement \(February 21\) \(2/15/05\)](#)
- [SLD Provides Clarification for Eligibility of Priority 1 Services \(2/15/05\)](#)
- [Invoice Improvement Update: Billing/Shipping Date Review \(2/14/05\)](#)
- [SPIN Support for Online Filers \(2/14/05\)](#)
- [SLD Posts Improved Online Form 424 \(2/7/05\)](#)
- [SLD Issues FY2005 Form 470 RNLs \(2/7/05\)](#)
- [Sample Letter of Agency \(LOA\) Available \(2/7/05\)](#)
- [Miscellaneous Updates to Web Site \(2/1/05\)](#)
- [What's New Archives](#)

### Holiday Hours Announcement (February 21) (2/15/05)

[Top of Page](#)

The Schools and Libraries Client Service Bureau will be closed on Monday, February 21, 2005 in observance of Presidents' Day. The Client Service Bureau will resume normal operations on Tuesday, February 22, 2005 at 8:00 a.m. EST.

### SLD Provides Clarification for Eligibility of Priority 1 Services (2/15/05)

[Top of Page](#)

The SLD has recently seen marketing efforts regarding video and other services in the Telecommunications and Internet Access categories that misconstrue FCC eligibility requirements.

In the Telecommunications category of service, the FCC's Eligible Services List indicates, in the listing for "Distance Learning Circuits," that "[t]ransmission services that provide [video or other] distance learning are eligible for discount." Some may have mistakenly concluded that this statement indicates that any Distance Learning service is eligible, when in fact the statement is limited to eligibility for the transmission services that enable distance learning.

Since a full distance learning system may include components beyond the FCC's definition of a telecommunications service, applicants must use care that the costs of ineligible features have been removed when submitting funding requests.

In the Internet Access category of service, the FCC's Eligible Services List indicates that the Internet Access category of service is "limited to the provision of 'basic conduit access' to the Internet." Some may have mistakenly concluded that Internet Access can include functions that go beyond "basic conduit access" to the Internet, such as a direct exchange of data or video between applicant sites. Such conclusions are incorrect. In the Internet Access category of service, the SLD will only fund services that are within FCC requirements for "basic conduit access" to the Internet. Funding in this category will not be provided for transport of point-to-point connectivity of data, video, or voice applications that are to be provided only by eligible telecommunications carriers.

Applicants are cautioned that funding requests for products and services that are ineligible should not be submitted. Any funding requests that include a combination of eligible and

ineligible components must be cost-allocated to remove ineligible features.

#### Invoice Improvement Updater Billing/Shipping Date Review (2/14/15) [Top of Page](#)

SLD has initiated an evaluation of the invoice review process. The goal of this evaluation is to speed up the processing of invoices without compromising program integrity. As SLD implements improvements to the invoice review process, notice will be posted to this web site with "Invoice Improvement Update" in the title. This is the first of these postings.

In the past, if the date for customer billing or shipping reported on a line in Column 11 or Column 12 on an FCC Form 474 (SPI Form) was:

- before the start of the funding year,
- before the service start date reported on the Form 486, or
- after the close of the funding year and the last allowable date to invoice,

the invoice reviewer was required to contact the service provider, work through the discrepancy, and then verify receipt of the necessary documentation that supported compliance with program rules.

Under a recently-enacted change to the review process, if the billing or shipping date in a line item on a SPI Form does not comply with program rules, that line item will be denied.

A line item denied for this reason will be featured on a remittance statement with the appropriate invoice error code. This line item may be submitted on a new SPI Form with the correct date.

If you have any questions, please contact the Client Service Bureau.

#### SPIIN Support for Online Filers (2/14/15) [Top of Page](#)

If you are still filing your Form 474, and are filing online, you must have a Service Provider Identification Number (SPIN) for each Funding Request in order to progress through Block 5 of the online form. Filers who do not have a SPIN will receive a message as they attempt to complete the form directing them to call the Client Service Bureau (CSB) for assistance.

Please note that SPIN assistance is available for those online filers who have completed the competitive bidding process and selected their service providers, but whose service providers' SPIN assignment has not yet been completed. (Manual filers are able to provide either the service provider name or the SPIN in order to meeting Minimum Processing Standards.) The Item 21 attachment should clearly indicate the name of the service provider. Call the CSB toll-free at 1-888-203-8100, and representatives will provide you this assistance. Remember that the CSB hours of service are 9:00 a.m. to 5:00 p.m. EST.

#### SLD Posts Improved Online Form 474 (2/11/15) [Top of Page](#)

SLD has posted an improved online Form 474. The information required on the form is the same as the previous version; however, the look and feel is somewhat different. The improved form has more functionality and is easier to use. Following is a summary of the changes:

**Block 1, Item 7** - The total invoice amount is now an automatic calculation. This item will be automatically updated each time you complete a new line in Block 2.

**Save and Exit** - You may now save your work and exit the system without submitting the Form 474. You may then return at a later time to complete and submit the form. To access an incomplete form, you will need the invoice number and security code that was supplied to you after you first completed Block 1. Once you have submitted a Form 474, you may not make any changes to that form. However, you may still view your Form 474 at any time using the invoice number and security code.

using the invoice number at the bottom of the page.

**Question/Problem** – Click this button to submit a problem or comment about the Form 474 to the Client Service Bureau.

**Print Preview** – When you click the Submit button, the Print Preview function will display a copy of your Form 474. You may print your form at any time using the Print Preview function.

**Unlimited number of line items** – You may now submit an unlimited number of line items.

**Block 2 Line Item Summary** – As you add each line item, the Block 2 total will be updated.

*If you have any questions please call the Client Service Bureau.*

<b>SLD Issues FY2003 Form 470 RNLs (2/1/05)</b>	Top of Page
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The SLD has begun to issue Receipt Notification Letters for Funding Year 2005 Forms 470. These letters will be mailed in daily batches of about 5,000 per day, from January 31 through February 8, 2005.

You may view a [Sample Form 470 Receipt Notification Letter \[PDF\]](#) in the Reference Area of this web site.

<b>Sample Letter of Agency (LOA) Available (2/1/05)</b>	Top of Page
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The SLD has posted a sample Letter of Agency (LOA) in the Reference Area of this web site.

A Letter of Agency demonstrates the authorization of the person (on FCC forms, the "Authorized Person") to sign an FCC form on behalf of one or more eligible schools and/or libraries. Generally, two situations require an LOA or similar authorizing document:

1. Consortium members file a LOA with their consortium leader verifying their knowledge of their membership and participation in the consortium. The consortium leader must keep these letters on file.
2. A consultant — or anyone signing as the authorized person who is not a school or library employee — should have an LOA from the applicant expressly authorizing the consultant to represent the applicant.

You can view the [Sample Letter of Agency](#) through the document [Letters of Agency](#) posted to the Reference Area of this web site.

<b>Miscellaneous Updates to Web Site (2/1/05)</b>	Top of Page
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Following is a list of the documents or pages that have changed on this web site since the last posting on updates:

A new link — [Site Visits](#) — has been created in the right-hand column of the SLD web pages. This link will take users to a new external web site that acts as a guide to the site visit process, with a description of the process, documentation needed, and contact information.

The document [Item 21 Attachments for Form 474](#) has been updated to include optional information that applicants can include in their Item 21 attachments to reduce the likelihood that Program Integrity Assurance will ask for that information during the application review process.

The document [Cost Allocation Guidelines for Products and Services that Contain Eligible and Ineligible Components](#) has been updated to feature the correct telephone number for questions about cost allocation from service providers and manufacturers.

February 2005 Announcements - Schools & Libraries (USAC)

Page 4 of 4

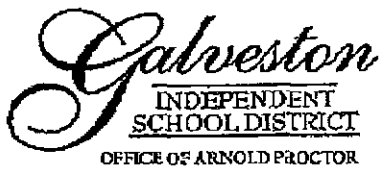
Critter List: February 15, 2005

Head Roger You are correct; we had free at 3:00pm 2/15/05.  
Our hours of operation are 9AM to 5PM, Eastern Time, Monday through Friday.  
Avenue of Peace, York, PA 17404, report it to our website below please.  
© 1997-2005, Universal Service for Migratory Children, 21 Ridge Lane, York



**Exhibit C**

BIEN: 141339  
Form 471 Application Number: 495787



*All children can and will learn.*

, 2007

on If May Concern:

Arcidiacono was employed by Galveston Independent School (GISD) from  
2001 through December 15, 2006. During this time, he served as Director  
basing. He was authorized by GISD to conduct all competitive bidding  
and to sign and certify for GISD the 2006 E-Rate applications.

ly,

Proctor

nt Superintendent for Business and Operations

Arnold Proctor, Assistant Superintendent for Business & Operations

O. Box 660 • Galveston, Texas 77551 • (409) 766-5107 (Office) • 409-766-5106 (Fax)